



**Development
Services Agency**

John R. Kasich, Governor

David Goodman, Director

January 19, 2016

Nelson W. Burns, President/CEO
Coleman Professional Services, Inc.
5982 Rhodes Road
Kent, Ohio 44240

Subject: Monitoring Report; Homeless Crisis Response Program; Grant Numbers: S-L-13-7GJ-1 and S-L-14-7GJ-2; Supportive Housing Grant Program; Grant Numbers: S-Y-12-7GJ-1 and S-Y-14-7GJ-1

Dear Mr. Burns:

Kimberly Alexander, of my staff, conducted a monitoring visit on November 20, 2015, at Coleman Professional Services, Inc. to review the above-noted grants. Thank you for your time and cooperation.

The Office of Community Development's (OCD) objective in conducting a monitoring visit is to ensure that: (1) the recipient carried out the program as described in its application; (2) the project complies with program requirements; and (3) the recipient has a continuing capacity to carry out the approved program in a timely manner. During a monitoring visit, OCD also provides technical assistance in specific program areas, as needed.

The monitoring results are based on a representative sample of grant-related files and a limited review. Attached is an analysis of Coleman Professional Services, Inc.'s performance and compliance. Since findings were noted by OCD, a response to this monitoring report is required within 30 days of the date of this report.

Questions regarding the monitoring visit should be directed to Kimberly Alexander at (614) 466-0740.

Sincerely,

Michael A. Hiler, Deputy Chief
Office of Community Development

MAH/SG/KDA/TDK

c: OCD: Scott Gary
Monitoring File

GRANT NUMBERS: S-Y-12-7GJ-1, S-L-13-7GJ-1, S-Y-14-7GJ-1, and S-L-14-7GJ-2

ORGANIZATION: Coleman Professional Services

DATE OF VISIT: November 20, 2015

OCD STAFF: Kimberly Alexander

1. **PROJECT DESCRIPTION**

Coleman Professional Services operates a 55-unit facility-based permanent supportive housing program for disabled single male and females who are at or below 35% of Area Median Income. Grant funds support housing operations.

Coleman Professional Services also operates the Homeless Crisis Response Program (HCRP) to provide homeless prevention and rapid re-housing assistance in Lake, Ashtabula, Geauga, Portage, and Trumbull counties. The agency is providing services and assistance to homeless individuals and families who are below 30% AMI through financial assistance and housing relocation and stabilization services.. The key partners in providing assistance are Catholic Charities Ashtabula,, Ashtabula County Community Housing Development Organization, Family and Community Services, Inc., Humility of Mary Housing, Inc., Trumbull County Mental Health and Recovery Board, Lifeline, Inc., Ecumenical Shelter Network of Lake County, Geauga Domestic Violence Shelter and Women Safe, Inc.

2. **ADMINISTRATIVE**

Coleman Professional Service's administrative files were reviewed for compliance with grant requirements. Items examined included the agency's procurement policy, contractual agreements, board minutes, personnel policies and OCD required reports and correspondence. The reviewed files contained appropriate information.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

Coleman Professional Services staff is currently entering information into HMIS. OCD staff reviewed the information on the latest agency-generated reports and confirmed that the HMIS-generated report is consistent with other client data maintained by the agency. Coleman Professional Services is advised that the "Percentage of Null/Missing" data will be among the rating criteria in future application cycles.

3. **PROGRAM**

Permanent Supportive Housing

Coleman Professional Services permanent supportive housing program provides 55-units of scattered-site housing units to households at or below 35 percent of AMI in Portage County. The units were occupied by 45 households comprised of 45 adults.

Five case files representing 10 clients were reviewed and found consistent with the approved application and corresponding guidelines. The files contained case management notes and documentation of services provided including intake, case management, and budgeting and life skills classes.

Coleman Professional Services proposed to provide permanent supportive housing to 12 households during the period January 1, 2013 to December 31, 2014 and served 61 households during this period according to the HMIS data provided.

HCRP Rapid Rehousing and Housing Prevention

OCD staff reviewed ten homeless prevention client files and ten rapid re-housing files for consistence with HCRP guidelines. This included a review of completed assessment forms, documentation that the households at imminent risk of homelessness as well as income eligible as appropriate, and that a minimum level of assistance was provided. The files were also reviewed for other required documentation including leases, utility disconnect or eviction notices, rent reasonableness calculations and habitability and lead-based paint inspections.

The file review confirmed that rapid-rehousing files contained documentation of homelessness and the homelessness prevention files contained documentation that funds were targeted to eligible individuals and families who "would be homelessness, but for this assistance." These included documentation that clients served by the program had an eviction notice and an assessment tool that included risk factors for homelessness was used. The homelessness prevention files contained income documentation demonstrating that the household was below 30 percent of Area Median Income (AMI).

HCRP guidelines state that grantees must "provide just enough (and no more) assistance to help a person stabilize their current housing situation or move to more stable housing." The case file review revealed that the agency determines the level of assistance provided based on an assessment of the household's resources and income.

Advisory #1

The OCD monitor noted that Coleman Professional Services partner agencies did not have all required documentation in the file as noted below:

- Family and Community Services – client files for clients #103487, #162094 and #162405 were missing verification of income.
- Geauga Domestic Violence Shelter and Ashtabula County CHDO – client files for clients #3641 and #2005 (Gauga) and clients #164246, #165620, #163387, #163394, #109132 and #157950 (Ashtabula) need to include the HMIS/comparable data entry and exit dates.
- Catholic Charities Ashtabula – agency needs to place the HMIS entry and exit dates in the client files for clients #15437, #139724, #4721, #154347, and #166023. It is also recommended the agency separate the 3-month recertification with a colored piece of paper or some other method along with all of the backup documentation to help demonstrate appropriate certifications were conducted.
- Lake County – client files for clients Teresa Jackson and Marlene Trivisonno did not include HMIS numbers, rent reasonableness and 3-month recertification. In addition, income verification should include review of more than one pay stub to verify annual income. When verifying wage documentation the number of checks to review will vary, but the sample must be large enough to determine the rate and frequency of pay. If the pay fluctuates significantly from check to check, the agency must review checks for the 3-month period of time prior to admission to the program to estimate income

Recommendation

The agency needs to ensure that the partner agencies have all the required documentation in the clients file at the time of eligibility determination. Describe the actions taken by Coleman Professional Services, Inc. to assure that all documentation is available and appropriately filed prior to eligibility being approved. In addition, provide a copy of the missing pieces of documentation, as noted above, to OCD as part of the agency's response.

Coleman Professional Services proposed to provide 75 households with homelessness prevention assistance and 102 households with rapid-re-housing assistance during the period January 1, 2013 to December 31, 2014. The agency actually served 126 households with homelessness prevention services and 126 households with rapid re-housing assistance during the grant period

The grantee is reminded of the need to prioritize the use of HCRP funds for rapid re-housing assistance, especially in an area such as Region#5 that has an abundance of emergency shelters relative to other Regions in the Balance of State. This will likely be a review criterion in future rounds of funding as applications will include a competitive element as opposed to the total allocation method currently used.

4. FINANCIAL

While the financial management system and internal controls were examined, Coleman Professional Services is reminded that OCD's financial monitoring was of limited scope and was not an audit. The monitoring revealed that the agency appears to be practicing fund accounting. The agency was using fund accounting and line items to segregate grant funds as a separate cost center. The monitoring revealed that agency time sheets are signed by both the employee and the employee's supervisor.

A limited cash disbursements test was conducted on four grant expenditures. The test revealed that the reviewed payments appeared to be consistent with corresponding guidelines. The test also revealed that reviewed expenditures were made in a timely manner for eligible activities.

5. SUMMARY

Coleman Professional Services is to be commended for the services it is providing to homeless individuals in the Lake, Ashtabula, Geauga, Portage, and Trumbull counties. The agency should be commended for providing comprehensive services to homeless families. The agency is encouraged to work closely with the Region's Homeless Planning Committee to determine how best to maximize the use of HCRP funds to rapid re-housing assistance as opposed to homelessness prevention.

OCD thanks Mr. Burns and his staff for their availability and assistance during the monitoring visit.

MAH/SG/KDA/TKD